U.S. DEPARTMENT OF THE INTERIOR – BUREAU OF RECLAMATION

SAN LUIS DRAINAGE FEATURE RE-EVALUATION

Alternatives Discussion
California Coastal Commission
October 8, 2002 – San Francisco, California
Meeting Summary

Reclamation is refining and narrowing alternatives for the San Luis Unit Drainage Feature Re-evaluation. Reclamation met with representatives from the California Coastal Commission to specifically discuss the ocean disposal alternative. Participants received a project overview and a review of the alternatives. Participants discussed anticipated concerns about an ocean disposal project through the Coastal Zone.

Meeting Participants

Mark Delaplaine, Coastal Commission

Jack Gregg, Coastal Commission

Jason Phillips, Reclamation

Marian Echeverria, Reclamation

Terry Cooke, URS

Jennifer Allen, PAM

Meeting Purpose and Objectives

- Provide an overview of the Feature Re-evaluation process
- Discuss drainwater source control and re-use
- Present alternatives focusing on the ocean disposal option and impact modeling activities
- Obtain input from participants

Participant Introduction

Participants were asked to describe their roles at the Coastal Commission. Mark Delaplaine works in the Federal Consistency Unit, which ensures that federal activities within the Coastal Zone are consistent with the Coastal Act and local coastal plans. If a project takes the route through San Francisco Bay to the ocean, then it is the Bay Conservation and Development Commission's jurisdiction. Objectives of the Coastal Commission are to preserve coastal environment, agriculture, and habitat/natural resources.

Jack Gregg is the Manager of the Water Quality Unit. The group's major concerns are non-point source pollution and impacts on water quality along the coast. The Coastal Commission does not set the water quality standards, that is the job of the Regional Water Quality Control Board or the State Water Resources Control Board. The Coastal Commission works cooperatively with those agencies to develop the standards.

Project Overview

Jason Phillips reviewed the history of Reclamation's involvement with the San Luis Unit. He presented the key events since the San Luis Act (1960). He reviewed the court case under which Reclamation is doing this Feature Re-evaluation. He continued with a description of the drainage service area and the components of a complete drainage process. Participants provided the following comments and questions.

- Reclamation should indicate where other units are within the Central Valley Project (CVP) and present information about drainage in those areas. This information should include any information about other units desire to "piggy back" on efforts for the San Luis Unit.
- What is the source of the water used for irrigation in this area? What are the farmers adding to the system?

  Some of the water used for irrigation is pumped from groundwater resources. Another source is imported surface water delivered by the federal CVP. Salts and selenium naturally occur within the soils in this area and the imported water is not the major source of these constituents.

- What is the current status of drainage impaired areas in the San Luis Unit?

  The farmers in the San Luis Unit that are in need of drainage are currently holding the water on site as shallow groundwater. This shallow groundwater can negatively affect the productivity of the farmland by introducing water levels and salts in the crop root zone.

- What is the agricultural value of the San Luis Unit?

  Westlands Water District has estimated the total income (direct and indirect) for agriculture in this area to be $3.5 billion. Reclamation has not yet completed a direct analysis.

Drainwater Source Control and Re-use

Jason Phillips presented information on the various source control and re-use options. He highlighted the re-use plan indicating that drainage need could be reduced by 80% with the implementation of a re-use plan.

Other Disposal Alternatives

Jason Phillips reviewed the In-Valley and Delta Disposal Options. Participants provided the following comments and questions.

- For the In-Valley Disposal, is the cost determined for a 50-year payment period and what would the capital costs be?

  The cost range is for a 50-year payment plan. The Federal capital costs for In-Valley are estimated at $590 million.

- Reclamation should consider tying disposal lines into the San Joaquin River.

  The San Joaquin River is not an option because a Total Maximum Daily Load (TMDL) for salts has been set. Also, selenium TMDL requires lower loads be discharged to the river after 2009, making it unlikely that discharge will be feasible. The treatment that would be required to meet water quality standards would require reverse osmosis. Reverse osmosis is an expensive process and farmers would prefer to reuse the water if it is treated to that extent.

- Reclamation must emphasize that all the alternatives are being kept on the table for comparison purposes. Each alternative presents a number of permitting and impact issues so it is good to keep them all out there.

Ocean Disposal Alternative

Jason Phillips and Terry Cooke reviewed the Ocean Disposal alternative. Participants provided the following comments and suggestions regarding an ocean disposal alternative.

- What concentrations of selenium are expected in the discharged water? What is the natural level of selenium in the ocean?

  The concentration will increase over time as water is reused. The average concentration is expected to be 150 parts per billion (ppb). Currently there is no data to estimate what concentrations would be after 50 years, but we're estimating 360ppb. The selenium level in the ocean is approximately 0.1 to 0.2 ppb. Discharge would meet this concentration through the use of a diffuser and a mixing zone estimated at 20 meter tall and 5 meters wide and 30 meters long.

- What are the cumulative impacts of an ocean disposal?

  If an ocean disposal project were successfully implemented at an affordable cost, other entities may become interested in utilizing the system. Currently, Reclamation is only considering the San Luis Unit in the project scope. Reclamation would not build the system with extra capacity to serve outside entities. Any expansion of the system would require constitute another federal action.

- What are the potential impacts of the project on outflow of sediments to Morro Bay?

  The project would probably neither impede nor increase the sediment flow to Morro Bay. The discharged water flow would be piped the majority of the route and the release in the ocean would occur underwater quite a distance from the shoreline.

- If Ocean Disposal is determined as the preferred alternative, Reclamation would not be required to apply for any local permits because this would be a federal project. The State Water Resources Control Board (with input from the Environmental Protection Agency and the Coastal Commission) would set any water quality standards. The Coastal Commission would look at issues such as impacts to fish, ocean water quality, migratory whale territory, biological survey information, direct impacts to marine resources, and commercial and recreational fishing before signing off on a project. The Coastal Commission would also review any local coastal plans and any other current projects in the area.

Land Retirement

Participants provided the following comments and suggestions regarding land retirement.

- The Environmental Impact Statement (EIS) should spell out Reclamation's approach to land retirement.

  The Preliminary Preferred Drainage Service Plan (due out in December) as well as the EIS will include specific information laying out Reclamation's approach to land retirement.

Role of the Coastal Commission

Participants provided information regarding the role of the Coastal Commission in federal projects within the Coastal Zone.

- If the final project involves potential impacts within the Coastal Zone, Reclamation will have to submit a Consistency Evaluation to show that the alternative is consistent with the Coastal Plan. The appropriate time to submit this evaluation is upon completion of the Draft EIS (It can be a chapter within the Draft EIS). The Coastal Commission will want to see any comments submitted during the review of the Draft EIS and generally will make a determination before the completion of the Final EIS. A phased review is also possible in order for Reclamation to receive input from the Coastal Commission along the way. The Coastal Commission is required to make a determination within 60 days of submittal of the Consistency Evaluation.

  The Coastal Commission operates under a standard that projects need to be consistent to the "maximum extent practicable." This standard allows for flexibility in the determination process for projects that have unavoidable inconsistencies but legally still must be implemented for some reason (e.g. mandate by Congress, court order.)

  The Coastal Commission is also required to hold public hearings on a project before a determination is made. The Coastal Commission is fiscally responsible for these activities and would not require reimbursement from Reclamation.

Other Comments and Suggestions

Participants provided the following additional comments about the project process.

- What is the probability that deep well injection could work for this project?

  At this point, there are many unknowns for deep well injection. Permitting issues are being reviewed, but permits would depend on the location of the injection. Reclamation is working with other agencies to determine the possibilities.

Schedule

Jason Phillips reviewed the anticipated milestones for 2002 and beyond.

- Preliminary Evaluation of Alternatives (internal evaluation results) – September 2002
- Preliminary Preferred Drainage Service Plan – December 2002
- Initiate EIS – January 2003

Action Items

- The Coastal Commission will provide Reclamation with information on similar projects and cases that have been presented by other entities seeking to build an ocean disposal system.
- Reclamation will contact the Coastal Commission in the middle of 2003 before publication of a Draft EIS and after more project information is available.